REDACTED

SITE: V.C. Hightower Trail Co
CREEK: 2.2
OTHER: v. 15

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BLASLAND, BOUCK & LEE, INC.
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Transmitted Via First Class Mail

December 9, 2005

[redacted]
644 East Hightower Trail
Social Circle, GA 30025

Re: Soil Sampling Data Summary Report for
644 East Hightower Trail, Social Circle, GA
BBL Project #: 85533

Dear [redacted]

On August 26, 29, and 30 and September 1, 12, and 13, 2005 and with your permission, Blasland, Bouck & Lee, Inc. (BBL) installed groundwater monitoring wells, collected soil samples, and collected groundwater samples from your property located at 644 East Hightower Trail in Social Circle, Georgia. These activities were performed on behalf of Exxon Mobil Corporation (ExxonMobil) to provide data to evaluate the potential impacts of a former fertilizer manufacturing plant whose facilities appear to have been located on, or adjacent to, your property.

All soil samples collected were tested in the field to determine the approximate levels of arsenic and lead, which research has shown may be related to past operations of the former fertilizer plant. Based on these field test results, select samples were submitted to, and analyzed by, a laboratory approved by the United States Environmental Protection Agency (USEPA).

The purpose of this letter is to describe the well installation and soil and groundwater sampling activities that were performed at your property and to present the results. Also included are photos of the inspection that was performed to document the condition of your property at the time of sampling (Attachment 1). Copies of this report are being submitted to the USEPA.

Soil Sample Collection Activities

Prior to sampling, the locations of underground utilities were identified by a utility locating service to minimize the possibility of disrupting services to the property and protect the safety of the workers.

Three types of soil samples were collected from your property as follows:

- Surface soil samples were collected from 0 to 6 inches below ground surface from one location in the front yard and two locations in the back yard. At each of the three locations, four additional samples were collected in a 10 foot radius at each location, mixed together in equal amounts, and then tested in the field to determine the approximate concentrations of arsenic and lead. Field testing was performed on the surface soil samples using a portable X-ray fluorescence (XRF) device. The surface soil samples were then sent to the laboratory for

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analysis. All samples submitted to the laboratory were analyzed for metals (including arsenic and lead) and pH (soil acidity).

- Deeper soil samples were collected from one location in the front yard and two locations in the back yard. The locations of these deeper soil samples are shown on Figure 1. At each location, soil samples were collected from 0.5 to 2 feet, 2 to 4 feet, 4 to 6 feet, and 6 to 8 feet below ground surface. These samples were tested in the field using the XRF device described above to determine the approximate concentrations of arsenic and lead. Based on these results, select samples were sent to the laboratory and analyzed for metals (including arsenic and lead) and pH (soil acidity). Toxicity Characteristic Leaching Procedure (TCLP) arsenic and lead was performed on one soil sample exceeding the USEPA's soil screening levels for arsenic and/or lead. TCLP analysis results are used to determine disposal and treatment options for impacted soils.

- Soil samples were also collected from the borings for the two groundwater monitoring wells installed on your property. The location of the two monitoring wells is shown on Figure 1. Soil samples were collected from 0 to 0.5 feet, 0.5 to 2 feet, 2 to 4 feet, 4 to 6 feet, and 6 to 8 feet below ground surface. These samples were tested in the field using the XRF device described above to determine the approximate concentrations of arsenic and lead. Based on these results, select samples were sent to the laboratory and analyzed for metals (including arsenic and lead) and pH (soil acidity).

A list of the soil samples collected from your property is provided in Table 1.

Groundwater Monitoring Well Installation

Two groundwater monitoring wells were installed on your property; one on the north side and one on the south side of your property. The locations of wells SC-MW-1 and SC-MW-4 are shown on Figure 1. The monitoring wells were installed to an approximate depth of 25 and 35 feet below ground surface, respectively and were completed and developed in accordance with USEPA guidelines.

Groundwater Sample Collection Activities

Groundwater samples were collected from the monitoring wells located on the property on September 12 and 13, 2005. Groundwater samples were analyzed for metals, nitrate, sulfate, chloride, alkalinity, hardness, and total dissolved and total suspended solids. Field measurements included pH, temperature, conductivity, dissolved oxygen, redox potential, and turbidity. The groundwater sample analyses performed are provided in Table 2.

Results of the Soil Sampling

The USEPA has established screening levels (i.e., levels that trigger additional assessment and evaluation) for metals. The USEPA screening values for arsenic and lead are 27 milligrams per kilogram (mg/kg) and 400 mg/kg, respectively.

Arsenic was detected in 14 soil samples collected from your property at concentrations up to 1,160 mg/kg, with 7 samples containing arsenic at concentrations greater than USEPA's screening level of 27 mg/kg (Table 2). Lead was detected in 14 soil samples collected from your property at concentrations up to 2,300 mg/kg, with 3 samples containing lead at concentrations greater than USEPA's screening level of 400 mg/kg (Table 2). Antimony, iron, and vanadium were also detected above USEPA's screening levels in the samples collected from your property.

One soil sample exceeding the USEPA's soil screening levels was selected for TCLP analyses. TCLP arsenic and lead were not detected during the analysis (Table 2).

Laboratory analytical results for the soil samples collected from your property are provided in Table 3.

Results of the Groundwater Sampling

Groundwater samples were collected from the monitoring wells on September 12 and 13, 2005. Groundwater concentrations are compared to the USEPA screening levels. Laboratory analytical results indicate that arsenic and lead were not detected in the groundwater; however, antimony, cadmium, copper, and manganese were detected slightly above the USEPA screening levels. Laboratory analytical results for the groundwater samples collected from the property are provided in Table 4.

Conclusion

As described above, soil samples collected from your property contained concentrations of arsenic and lead above the USEPA's screening levels of 27 mg/kg and 400 mg/kg, respectively. Antimony, iron, and vanadium were also detected above USEPA's screening levels in the samples collected from your property. Arsenic and lead were not detected in the groundwater samples collected; however, antimony, cadmium, copper, and manganese were detected slightly above the USEPA screening levels.

ExxonMobil is submitting these results to the USEPA. We will work with these agencies to determine what further actions (if any) are necessary for your property, and will keep you informed. Any necessary actions for your property will be described in the upcoming *Removal Action Delineation Report/Removal Action Work Plan* that will be prepared by BBL on behalf of ExxonMobil and reviewed and approved by USEPA. This plan will be prepared upon completion of all sampling activities required by USEPA.

Thank you once again for granting ExxonMobil access to your property to conduct these soil sampling activities.

Sincerely,

BLASLAND, BOUCK & LEE, INC.

Geoffrey G. Germann, P.E.
Senior Engineer II

GGG/cbc

Enclosures:
Table 1 – Summary of Analytical Program for Samples Collected from 644 East Hightower Trail
Table 2 – Summary of Analytical Program for Groundwater Samples Collected from 644 East Hightower Trail
Table 3 – Summary of Analytical Results for Detected Metals in Soil Samples Collected from 644 East Hightower Trail
Table 4 – Summary of Analytical Results for Detected Metals in Groundwater Samples Collected from 644 East Hightower Trail

Figure 1 – Sample Location Map 644 East Hightower Trail

Attachments:
Attachment 1 – Photographs

cc: D. Andrews, USEPA
B. Frink, ExxonMobil
R. Wallis, ExxonMobil
M. Ross, ExxonMobil
D. Pope, Carr, Tabb & Pope
A. Hill, Blasingame, Burch, Garrard & Ashley, P.C.

Information Redacted pursuant to 5 U.S.C. Section 552 (b)(6), Personal Privacy

Exemption 7 ____ (A) Interference with Enforcement Proceedings
____ (B) Right to Fair Trial
__X__ (C) Unwanted Invasion of Personal Privacy

Tables

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Table 1
Summary of Analytical Program for Samples Collected from 644 East Hightower Trail
Social Circle, Georgia

Sample Name	Depth (feet)	Sample Date	Arsenic and Lead Field Measurement	Laboratory Measurement: Metals	Laboratory Measurement: pH	Laboratory Measurement: TCLP & Total Arsenic and Lead	Comments
Front Yard Samples							
SCSB-644HT-5	0-0.5	09/01/05	X	X	X		Combination (composite) surface soil sample of five locations from the front yard.
SCSB-644HT-5	0.5-2	09/01/05	X	X	X		Soil sample collected from the front yard
SCSB-644HT-5	2-4	09/01/05	X	X	X		Soil sample collected from the front yard
SCSB-644HT-5	4-6	09/01/05	X	X	X		Soil sample collected from the front yard
SCSB-644HT-5	6-8	09/01/05	X	X	X		Soil sample collected from the front yard
SCSB-644HT-5-TCLP	0-6	09/01/05				X	Combination (composite) of soil samples at each depth interval
SCSB-MW-1	0-0.5	08/26/05	X	X	X		Surficial soil sample collected from the monitoring well location
SCSB-MW-1	0.5-2	08/26/05	X	X	X		Soil Sample collected from the monitoring well location
SCSB-MW-1	2-4	08/26/05	X	X	X		Soil Sample collected from the monitoring well location
SCSB-MW-1	4-6	08/26/05	X	X	X		Soil Sample collected from the monitoring well location
SCSB-MW-1	6-8	08/26/05	X				Soil sample collected from the monitoring well location not analyzed because arsenic and lead in the 4-6 foot interval were below USEPA screening levels.
Back Yard Samples							
SCSB-644HT-3	0-0.5	09/01/05	X	X	X		Combination (composite) surface soil sample of five locations from the back yard.
SCSB-644HT-3	0.5-2	09/01/05	X	X	X		Soil sample collected from the back yard
SCSB-644HT-3	2-4	09/01/05	X	X	X		Soil sample collected from the back yard
SCSB-644HT-3	4-6	09/01/05	X				Soil sample collected from the back yard not analyzed because arsenic and lead in the 2-4 foot interval were below USEPA screening levels.
SCSB-644HT-3	6-8	09/01/05	X				Soil sample collected from the back yard not analyzed because arsenic and lead in the 2-4 foot interval were below USEPA screening levels.
SCSB-644HT-2	0-0.5	09/01/05	X	X	X		Combination (composite) surface soil sample of five locations from the back yard.
SCSB-DUP-32	0-0.5	09/01/05		X	X		Duplicate sample of SCSB-644HT-2 (0-0.5)
SCSB-644HT-2	0.5-2	09/01/05	X	X	X		Soil sample collected from the back yard
SCSB-644HT-2	2-4	09/01/05	X	X	X		Soil sample collected from the back yard
SCSB-644HT-2	4-6	09/01/05	X				Soil sample collected from the back yard not analyzed because arsenic and lead in the 2-4 foot interval were below USEPA screening levels.
SCSB-644HT-2	6-8	09/01/05	X				Soil sample collected from the back yard not analyzed because arsenic and lead in the 2-4 foot interval were below USEPA screening levels.

Table 1
Summary of Analytical Program for Samples Collected from 644 East Hightower Trail
Social Circle, Georgia

Sample Name	Depth (feet)	Sample Date	Arsenic and Lead Field Measurement	Laboratory Measurement			Comments
				Metals	pH	TCLP & Total Arsenic and Lead	
SCSB-MW-4	0-0.5	08/30/05	X	X	X		Surficial soil sample collected from the monitoring well location
SCSB-MW-4	0.5-2	08/30/05	X	X	X		Soil Sample collected from the monitoring well location
SCSB-MW-4	2-4	08/30/05	X	X	X		Soil Sample collected from the monitoring well location
SCSB-MW-4	4-6	08/30/05	X				Soil sample collected from the monitoring well location not analyzed because arsenic and lead in the 2-4 foot interval were below USEPA screening levels.
SCSB-MW-4	6-8	08/30/05	X				Soil sample collected from the monitoring well location not analyzed because arsenic and lead in the 2-4 foot interval were below USEPA screening levels.

Notes:

1. Samples depths are measured in feet below ground surface.
2. Laboratory measurements were performed by TestAmerica, Inc. of Nashville, Tennessee.
3. Sample locations are shown on Figure 1.

Table 2
Summary of Analytical Program for Groundwater Samples Collected from 644 East Hightower Trail
Social Circle, Georgia

Sample Name	Sample Date	Laboratory Measurement								Comments
		Metals	Hardness	Alkalnity	Nitrate	Chloride	TSS	TDS	Sulfate	
SC-MW-1	09/12/05	X	X	X	X	X	X	X	X	Groundwater sample collected from monitoring well MW-1
SC-MW-4	09/13/05	X	X	X	X	X	X	X	X	Groundwater sample collected from monitoring well MW-4
SC-MW-90	09/13/05	X	X	X	X	X	X	X	X	Duplicate of groundwater sample collected from monitoring well MW-4

Notes:

TSS = total suspended solids

TDS = total dissolved solids

1. Laboratory measurements were performed by TestAmerica, Inc. of Nashville, Tennessee.
2. Sample locations are shown on Figure 1.

Table 3
Summary of Analytical Results for Detected Metals in Soil Samples Collected from 644 East Hightower Trail
Social Circle, Georgia

Analyte	Screening Criteria	Units	Concentration in Sample: SCSB-644HT-2 0 - 0.5 ft bgs 9/1/2005	SCSB-644HT-2-DUP 0 - 0.5 ft bgs 9/1/2005	SCSB-644HT-2 0.5 - 2 ft bgs 9/1/2005	SCSB-644HT-2 2 - 4 ft bgs 9/1/2005	SCSB-644HT-2 4 - 6 ft bgs 9/1/2005	SCSB-644HT-3 0 - 0.5 ft bgs 9/1/2005
Metals								
Aluminum	76000	mg/kg	10500 J	13100 J	18300 J	52200 J	75800	11400 J
Antimony	31	mg/kg	2.44 J	2.14 J	10.8 U	4.39 J	3.47 J	31.3
Arsenic	27	mg/kg	23.3	46.8	12.2	33.6	15.8	117
Barium	5400	mg/kg	144	160	59.5	65.3	48.8	307
Beryllium	150	mg/kg	0.626 J	0.895 J	1.08 U	1.25 U	0.999 J	0.26 J
Cadmium	37	mg/kg	0.492 J	0.764 J	0.495 J	1.89	1.22 U	3.43
Calcium	- -	mg/kg	2630 J	6220 J	1020 J	1980 J	911	4860 J
Chromium	210	mg/kg	12.9 J	18.8 J	27.6 J	58.8 J	157	17.8 J
Cobalt	900	mg/kg	5.67 J	7.53 J	4.39 J	3.45 J	2.97	21.2 J
Copper	3100	mg/kg	35.9 J	50.9 J	17.6 J	58.7 J	109	391 J
Iron	23000	mg/kg	17900	25300	20500	71900	86200	89700
Lead	400	mg/kg	34.3	28.4	11.1	23	24.1	1240
Magnesium	- -	mg/kg	789	766	213	316	1420	639
Manganese	1800	mg/kg	102	100	129	190	130	157
Mercury	23	mg/kg	0.0415 J	0.111 U	0.108 U	0.0629 J	0.122 UJ	0.627
Nickel	1600	mg/kg	9.2	16	3.89	9.85	6.85	5.87
Potassium	- -	mg/kg	1010 J	1330 J	286 J	479 J	1890 J	917 J
Selenium	390	mg/kg	R	R	R	4.81 J	3.33	5.77
Silver	390	mg/kg	1.11 U	1.11 U	1.08 U	1.25 U	1.22 U	4.52
Vanadium	78	mg/kg	36.2	48	49.2	152	188	19.1
Zinc	23000	mg/kg	28.6	29.8	21.4	43.4	42.9	414
Metals-Filtered								
Arsenic	5	mg/L	NA	NA	NA	NA	NA	NA
Lead	5	mg/L	NA	NA	NA	NA	NA	NA
Miscellaneous								
% Dry Solids	- -	%	89.7	90.4	92.4	79.8	81.8	82.4
pH	- -	pH Units	5.4	5.8	5.6	5.5	5.6 J	5.9

Table 3
Summary of Analytical Results for Detected Metals in Soil Samples Collected from 644 East Hightower Trail
Social Circle, Georgia

Analyte	Screening Criteria	Units	Concentration in Sample: SCSB-644HT-3 0.5 - 2 ft bgs 9/1/2005	SCSB-644HT-3 2 - 4 ft bgs 9/1/2005	SCSB-644HT-5 0 - 0.5 ft bgs 9/6/2005	SCSB-644HT-5 0.5 - 2 ft bgs 9/6/2005	SCSB-644HT-5 2 - 4 ft bgs 9/6/2005	SCSB-644HT-5 4 - 6 ft bgs 9/6/2005
Metals								
Aluminum	76000	mg/kg	3270 J	32700 J	20000	10400	10100	40800 J
Antimony	31	mg/kg	57.3 J	1.67 J	4.72 J	6.18 J	16.6	1.69 J
Arsenic	27	mg/kg	1160	11.8	26.9	26.7 J	281 J	44.6 J
Barium	5400	mg/kg	510	37	53.8	96.5	139	88.2 J
Beryllium	150	mg/kg	1.15 U	1.28 U	1.15 U	0.26 J	0.242 J	0.362 J
Cadmium	37	mg/kg	3.59	1.9	1.15 U	0.426 J	0.798 J	1.21 U
Calcium	- -	mg/kg	444 J	499 J	2040	3900 J	4980 J	740 J
Chromium	210	mg/kg	11.4 J	54.3 J	23.5	21.5 J	25.7 J	24.5 J
Cobalt	900	mg/kg	16.1 J	2.28 J	1.76	3.05	7.57	1.74
Copper	3100	mg/kg	289 J	44.9 J	40.8	68.4 J	183 J	96.9 J
Iron	23000	mg/kg	109000	72400	30400	20000	36700	33300 J
Lead	400	mg/kg	2300 J	44.1	150	226 J	610 J	25.9
Magnesium	- -	mg/kg	181	302	412	629	688	660 J
Manganese	1800	mg/kg	35.6	159	121 J	133 J	147 J	127 J
Mercury	23	mg/kg	1.9	0.139	0.22	0.25	0.368	0.0509 J
Nickel	1600	mg/kg	1.06 J	4.84	3.45	3.67	3.77	8.18
Potassium	- -	mg/kg	822 J	507 J	475	533	659	904
Selenium	390	mg/kg	7.49	3.12 J	2.31 UJ	2.36 UJ	2.42 UJ	2.41 U
Silver	390	mg/kg	11.9	1.28 U	0.616 J	1.18 U	1.48	1.21 U
Vanadium	78	mg/kg	6.97 J	169	54.8	30.7 J	31 J	72.2 J
Zinc	23000	mg/kg	245	53.1	63.2 J	102 J	195 J	41.6
Metals-Filtered								
Arsenic	5	mg/L	NA	NA	NA	NA	NA	NA
Lead	5	mg/L	NA	NA	NA	NA	NA	NA
Miscellaneous								
% Dry Solids	- -	%	87	78.3	86.6	84.7	82.5	79.5
pH	- -	pH Units	3.7	4.7	5.9	6.3	7.6	7.4 J

Table 3
Summary of Analytical Results for Detected Metals in Soil Samples Collected from 644 East Hightower Trail
Social Circle, Georgia

Analyte	Screening Criteria	Units	Concentration in Sample: SCSB-644HT-5 6 - 8 ft bgs 9/6/2005	SCSB-644HT-5-TCLP 0 - 6 ft bgs 9/6/2005
Metals				
Aluminum	76000	mg/kg	21400 J	NA
Antimony	31	mg/kg	3.22 J	NA
Arsenic	27	mg/kg	4.45 J	183
Barium	5400	mg/kg	19.4	NA
Beryllium	150	mg/kg	0.409 J	NA
Cadmium	37	mg/kg	1.27 U	NA
Calcium	- -	mg/kg	121	NA
Chromium	210	mg/kg	37.8 J	NA
Cobalt	900	mg/kg	3.94	NA
Copper	3100	mg/kg	164 J	NA
Iron	23000	mg/kg	7100	NA
Lead	400	mg/kg	21.4	365
Magnesium	- -	mg/kg	224	NA
Manganese	1800	mg/kg	354 J	NA
Mercury	23	mg/kg	0.127 U	NA
Nickel	1600	mg/kg	2.68	NA
Potassium	- -	mg/kg	215	NA
Selenium	390	mg/kg	2.54 U	NA
Silver	390	mg/kg	1.27 U	NA
Vanadium	78	mg/kg	207 J	NA
Zinc	23000	mg/kg	25	NA
Metals-Filtered				
Arsenic	5	mg/L	NA	0.05 U
Lead	5	mg/L	NA	0.05 U
Miscellaneous				
% Dry Solids	- -	%	78.7	80.8
pH	- -	pH Units	4.2 J	NA

Table 3
Summary of Analytical Results for Detected Metals in Soil Samples Collected from 644 East Hightower Trail
Social Circle, Georgia

Notes:
Shaded values exceed the site specific action level
bgs - below ground surface
J - estimated value
mg/kg - milligrams per kilogram
mg/L - milligrams per liter
NA - not analyzed
U - not detected
-- no site-specific action level defined
R - rejected

Table 4
Summary of Analytical Results for Detected Metals in Groundwater Samples Collected from 644 East Hightower Trail
Social Circle, Georgia

Analyte	Screening Level	Units	Concentration in Sample: SC-MW-01 9/12/2005	SC-MW-04 9/13/2005	SC-MW-04-DUP 9/13/2005
Metals					
Aluminum	36	mg/L	3.35	1.9	1.96
Antimony	0.006	mg/L	0.006 J	0.01 U	0.0075 J
Arsenic	0.010	mg/L	0.01 U	0.01 U	0.01 U
Barium	2.0	mg/L	0.0189	0.0803	0.0818
Beryllium	0.004	mg/L	0.0013 J	0.004 U	0.004 U
Cadmium	0.005	mg/L	0.0137	0.0006 J	0.0007 J
Calcium	--	mg/L	35.6	26.9	24.8
Chromium	0.1	mg/L	0.0063	0.0043 J	0.0059
Cobalt	0.73	mg/L	0.108	0.212	0.202
Copper	1.3	mg/L	5.45	0.0323	0.0183
Iron	11	mg/L	0.05 U	0.07	0.46
Lead	0.015	mg/L	0.005 UJ	0.005 UJ	0.005 UJ
Magnesium	--	mg/L	12.8	5.49	4.92
Manganese	0.88	mg/L	1.12	4.1	3.95
Nickel	0.73	mg/L	0.0471	0.0362	0.0349
Potassium	--	mg/L	2.02	44.2	40
Sodium	--	mg/L	1.57	4.21	3.74
Zinc	11	mg/L	8.5	0.0879	0.0739
Miscellaneous					
Chloride	--	mg/L	0.71 J	2.46	2.45
Hardness, CaCO3	--	mg/L	142	89.8	82.2
Alkalinity	--	mg/L	10 U	10 U	10 U
Nitrate as N	--	mg/L	2.45	0.83	0.83
pH	--	pH Units	4.5	5.1	5.2
Sulfate	--	mg/L	175	155	152
Total Dissolved Solids	--	mg/L	324	296	292
Total Suspended Solids	--	mg/L	1.71	4.43	3.85

Notes:
Shaded values exceed the screening levels.
mg/L - milligrams per liter.
J - estimated value
U - not detected
-- no site-specific action level defined

Figure

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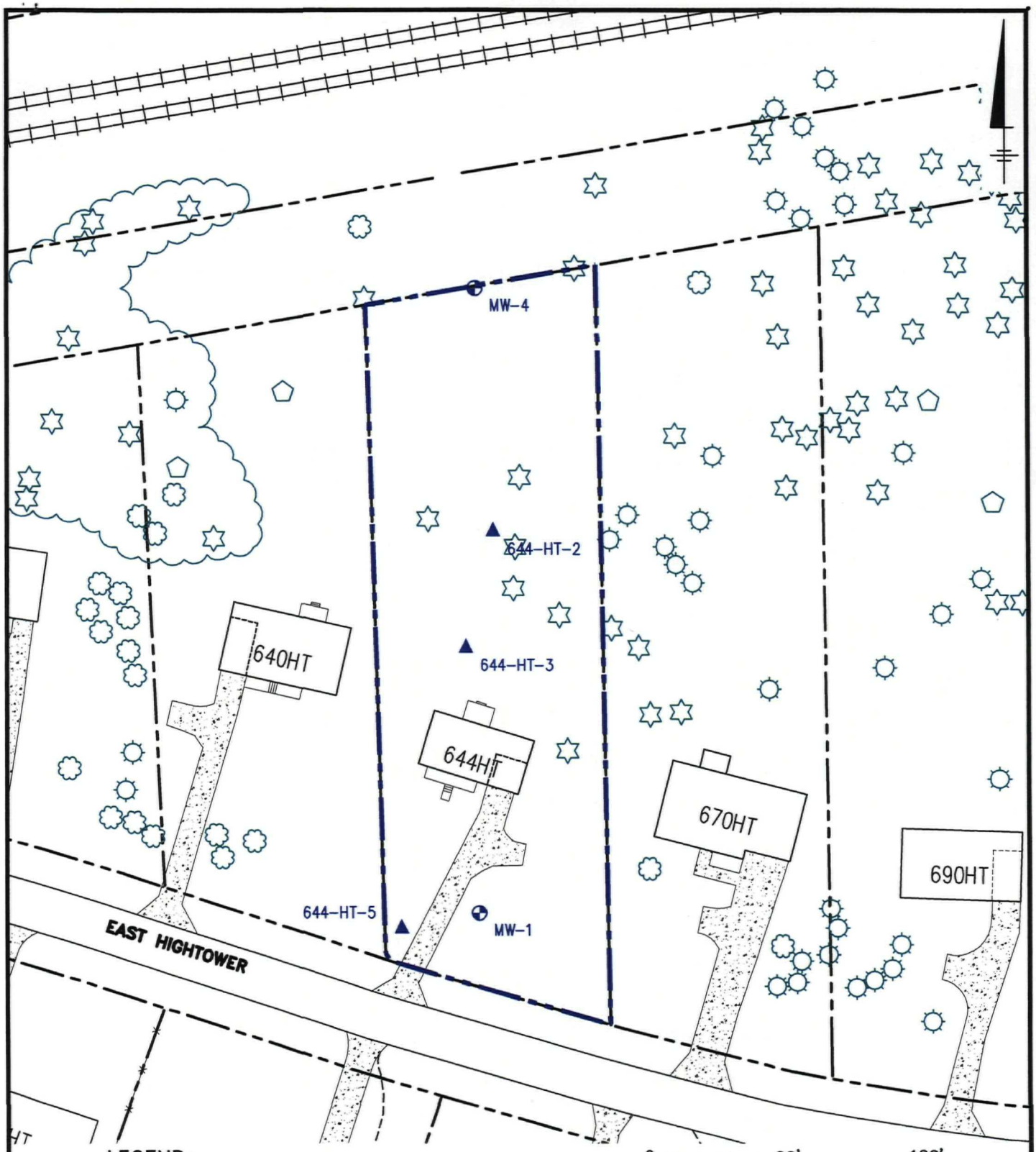

LEGEND:

- PROPERTY LINE
- CONCRETE
- FENCE LINE
- GEORGIA RAILROAD
- GROUNDWATER MONITORING WELL LOCATION
- SOIL BORING LOCATION
- TREES
- TREE LINE

0 60' 120'

GRAPHIC SCALE

EXXONMOBIL
VCC – SOCIAL CIRCLE, GEORGIA

SAMPLE LOCATION MAP FOR 644 EAST HIGHTOWER

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FIGURE
644HT

X: 85533X0P, X02.DWG
P: PLT-AP1
11/4/05 CAR-85-LEE
R: \CURRENT\OTHER\85533004\PR\85533G03.DWG

Attachment

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Attachment 1
Photographs of 644 East Hightower Trail, Social Circle, GA

644 East Hightower Trail, southern edge looking north.

644 East Hightower Trail, western edge looking north east.

Attachment 1
Photographs of 644 East Hightower Trail, Social Circle, GA

644 East Hightower Trail, western edge looking east.

644 East Hightower Trail, western edge looking north.

Attachment 1
Photographs of 644 East Hightower Trail, Social Circle, GA

644 East Hightower Trail, southern edge looking north.